

**THE SOUTH AFRICAN NGO COALITION
WESTERN CAPE PROVINCE**

CONSTITUTION

2009

INDEX

Heading	pg no.
i. NAME.....	3
ii. LEGAL STATUS.....	3
iii. NATURE OF THE ORGANISATION.....	3
iv. POWERS OF THE COALITION.....	3
v. AIMS AND OBJECTIVES.....	4
vi. ORGANISATIONAL STRUCTURE.....	5
vii. LOSS OF POSITIONS ON COALITION ASSEMBLY COALITION COUNCIL, EXECUTIVE COMMITTEE.....	12
viii. POWERS AND DECISION MAKING.....	13
ix. FINANCES, INCOME AND PROPERTY.....	13
x. INDEMNIFICATION OF OFFICIALS, OFFICE BEARERS AND COMMITTEE MEMBERS.....	16
xi. RESIGNATION AND DISCIPLINE OF A MEMBER.....	16
xii. DISPUTES BETWEEN AND AMONGST OFFICE BEARERS, OFFICIALS, NATIONAL OR PROVINCIAL STRUCTURES	16
xiii. AMENDMENTS TO THE CONSTITUTION.....	16
xiv. INTERPRETATION.....	17
xv. DISSOLUTION.....	17

1. NAME

The name of the organisation shall be the South African NGO Coalition Western Cape Province (SANGOCO Western Cape Province) hereinafter referred to as “the Coalition”.

2. LEGAL STATUS

The Coalition shall be a body corporate:

- 2.1 with a legal identity of its own, separate from its members,
- 2.2 having perpetual succession even if the members and office bearers change from time to time,
- 2.3 capable of entering into contracts,
- 2.4 capable of owning property, and
- 2.5 capable of suing and being sued in its own name.

3. NATURE OF THE ORGANISATION

The organisation will be a Coalition of indigenous civil society organizations operating in the Western Cape.

4. POWERS OF THE COALITION

The Coalition shall have all the powers necessary for it to carry out its stated objectives effectively. Such powers shall include, but not be limited to:

- 4.1 To institute or defend any legal or arbitration proceedings and to settle any claims made by or against the Coalition,
- 4.2 To prudently invest funds of the Coalition.
- 4.3 To accept donations made to the Coalition and retain them in the form in which they are received, or sell them and re-invest the proceeds,
- 4.4 To purchase, acquire maintain, manage, develop, exchange, lease, sell, or in any way deal with property and assets of the Coalition,
- 4.5 To donate and transfer the property and assets of the Coalition to organisations with the same or similar objectives and the same exemptions from taxes and duties to those of the Coalition,
- 4.6 To borrow and to use the property or assets of the Coalition as security for borrowing,
- 4.7 To execute any act or deed in any deeds registry, mining titles or other public office.
- 4.8 To exercise all the management and executive powers that are normally vested in the Board of Directors of a Company, and

4.9 To exercise all the powers and authority of the Coalition not only in the Republic of South Africa but in any other part of the world.

5. AIMS AND OBJECTIVES

The objectives of the Coalition are as follows:

- 5.1 To contribute towards creating an enabling environment by influencing the legislative framework in which CSOs operate.
- 5.2 To identify development priorities and seek to influence donors, grantmakers, organized business and other stakeholders to support the Coalition's development agenda.
- 5.3 To promote community participation in the conceptualization, implementation and evaluation of the reconstruction and development of South Africa.
- 5.4 To conceptualize and implement advocacy programmes aimed at lobbying for policies which advance the interests of marginalized (e.g. the poor, women and rural) members of our society.
- 5.5 To build the institutional capacity of sectoral and provincial networks to effectively meet the needs of their members.
- 5.6 To support sectoral and provincial networks in their endeavours to lobby for an enabling framework environment in their respective spheres of operation.
- 5.7 To initiate discussion and stimulate debate amongst members organizations on strategic issues affecting the sector.
- 5.8 To assist member organizations to identify and address opportunities and threats in the socio-economic environment, which may advance or constrain the work of their respective organizations.
- 5.9 To promote cross-border networking and cross-pollination of information, knowledge and development experience in Southern Africa and other parts of the world.
- 5.10 To strengthen and develop the CSO leadership by sponsoring management and leadership development programmes.
- 5.11 To promote collaboration amongst CSOs working in the same geographical area or sector.
- 5.12 To affiliate to Southern African, African and international CSO structures and to influence socio-economic policies in society.
- 5.13 To collaborate on a principled basis through written agreements with other organs of civil society (for example, organized labour and faith-based organizations) in building a strong civil society in South Africa.

6. ORGANISATIONAL STRUCTURE

6.1 MEMBERSHIP STRUCTURE OF THE COALITION

6.1.1 Full membership

- a. Any indigenous CSO within the province of the Western Cape which subscribes to the aims and objectives, and pledges adherence to the Code of Ethics shall be entitled to become a full member of the Coalition by joining the appropriate sectoral committee, and, fulfilling all financial and other obligations commensurate with such membership, from time to time determined by the General Assembly.
- b. Full members of the Coalition shall be entitled to elect their representatives, to the structures of the Coalition.
- c. Through their elected representatives full members shall have access to the business of the Coalitions' Executive Committee structure. Member organizations shall observe the Code of Ethics of the Coalition. Member organisations shall be obliged to meet all financial and other obligations as shall be determined from time to time by the Coalition or any of its competent organs.

6.1.2 Associate Membership

a. Associate membership shall be available to:

- i. Any foreign CSO that undertakes development work in South Africa.
- ii. Any indigenous CSO that prefers not to, or is unwilling or unable to take up full membership
- iii. Any indigenous professional, economic interest body or faith-based organisation.

b. Rights and obligations of associate members

Associate members shall be entitled to attend meetings and participate in all structures of the Coalition provided that they shall not have the right to vote. Employees of associate member organisations, be they citizens of the Republic of South Africa or not, shall not be eligible to hold office in any of the structures of the Coalition. Associate members shall be obliged to meet all financial and any other obligations as the Coalition or any of its designated organs shall from time to time determine.

6.1.3 Loss of Membership

- a. A member organisation shall cease to be a member of the Coalition by giving notice to that effect, in writing, to its sectoral or the Coalition directly, as the case may be, at least one month prior to the effective date of the intended resignation.
- b. A member organization shall also cease to be a member if its membership is terminated by a relevant sectoral or provincial structure for misconduct, failure to adhere to the Code of Ethics or for bringing the name of the South African NGO Coalition into disrepute.

- c. A member CSO against which a charge of misconduct is laid shall be entitled to a fair hearing, provided that its membership shall be suspended for the duration of the investigation and the impending inquiry.
- d. Membership of any organization indebted to the Coalition for membership fee or any other financial obligation shall automatically lapse if the organization in question fails to meet such obligation notwithstanding a reminder giving such organization no more than 30 days to fulfil the obligation.

6.1.4 Autonomy Of Members

Members will remain autonomous organizations governed by their own constitution, registration, policies and procedures. Members will not be able to create any financial obligations for the Coalition. Members shall abide by the Constitution, policies, resolutions and programmes of the Coalition adopted by the majority of representatives in the structures and institutions of the Coalition.

6.2 GOVERNING STRUCTURES OF THE COALITION

6.2.1 General Assembly (GA)

The General Assembly shall be the highest decision making structure of the Coalition, with the purpose of ensuring that all general and specific policies and activities further the aims and objectives of the coalition, by means of majority support of resolutions.

6.2.2 Composition of the General Assembly

The Coalition Assembly shall be composed as follows:

- a. One representative per sector appointed every three years by any of the sectoral committees established by the Coalition;
- b. The duly elected office bearers of the Coalition; and
- c. The secretariat of SANGOCO. They will have speaking rights but no voting rights.

6.2.3 Powers and duties of the General Assembly

The General Assembly will further consider and decide on:

- a. The credentials of the delegates of the General Assembly
- b. The agenda of the General Assembly and its priorities
- c. Reports from the Coalition Council and Executive Committee
- d. Reports of the office bearers
- e. Financial reports including audited financial statements

- f. Ensure that quarterly review reports of the Coalition is circulated by the EC
- g. The nomination and election of the Coalition's office bearers
- h. The amendment of the Coalition's Constitution
- i. The adoption of new resolutions and amendment of any policy matter or document
- j. Any other matter which may be deemed to be in the interest of the Coalition, its members, the development needs of the country, or any other issue of general or international importance.

6.2.4 Meetings of the General Assembly

Annual General Meetings

- a. The Management Committee must every calendar year convene an Annual General Meeting (AGM).
- b. The first AGM must be held within fifteen (15) months of the adoption of this Constitution.
- c. All other AGMs must be held within three (3) months of the end of the financial year.
- d. At least twenty-one (21) days' written notice must be given to all members entitled to attend the meeting and must state the date, time and place of the AGM and the business to be transacted at the meeting.
- e. The business of each AGM must include:
 - i. the Chairperson's report on the activities of the Association,
 - ii. the consideration of the Annual Financial Statements,
 - iii. the appointment of Auditors [*or accounting officers*];
 - iv. the review of the Code of Ethics and any other appropriate matters.

Ordinary meetings of the General Assembly

- f. The GA will ordinarily meet once every three years.
- g. The Coalition Council will decide on the dates of the General Assembly
- h. The documentation and resolutions will be circulated at least two weeks (14 days) prior to the actual meeting date by the Secretariat.

Special Meetings of the General Assembly

- i. The Chairperson and the Executive Committee will convene a special meeting of the General Assembly giving written notice and providing an agenda within 14 days of the Coalition Council passing a resolution calling for such special meeting of the General Assembly.
- j. Should the Chairperson fail to call such a special meeting, the Executive Committee may nominate a Convenor for the meeting who should provide 14 days written notice of the meeting and an agenda.
- k. In the event of the office bearers position being vacant, or insufficiently filled, or circumstance prevail that has as a consequence the absence of office bearers from, with the effect that the requirements for a quorum is not met, a sectoral counsel may be called by any sector representative after having been so mandated.
- l. In certain circumstances and subject to certain conditions, both to be determined by the GA, a special meeting may also be called by way of a chairman's circular, which shall be conducted by means of electronic communications. The GA shall determine the criteria that need to be met in order to satisfy itself to the validity of the decision so reached.

6.2.5 Quorum

- a. The quorum for the GA shall be at least 50% plus one of the sectoral delegates, and should also be composed of the majority of the office bearers. Such delegates will be representative of members of civil society organizations in good standing with the sectors that submitted their names to the GA.
- b. If after two hours of the time fixed for the meeting, a quorum is not present, the meeting will stand adjourned to a time and place decided upon by the Chairperson.
- c. The quorum for an adjourned meeting will be those members present and in good standing and whose names have previously been submitted to the GA as delegates to the GA.

6.2.6 Election of Office Bearers

- a. All office bearers duly elected shall serve a period of three years, unless such term of service is terminated as per the conditions set out in this constitution.
- b. The General Assembly will elect:
 - i. The Chairperson
 - ii. The First Deputy Chairperson
 - iii. The Second Deputy Chairperson
 - iv. The Treasurer
 - v. The Deputy Treasurer

- vi. The Secretary

6.3 The Coalition Council (CC)

The Coalition Council shall conduct the affairs of the Coalition whilst the GA is not in session. The CC shall adopt general and specific policy measures which further the aims and objectives of the Coalition by means of resolution recorded by the Executive Director.

6.3.1 The Composition of the Coalition Council

- a. The CC will consist of a representative of each properly constituted sector. For this purpose the sector shall identify to the CC alternate two representatives anyone of whom may substitute any of the others should they fail to so represent.
- b. One delegate of each of the recognized sectors nominated by the respective sectors until reviewed in 2003 and as properly constituted at the provincial level.
- c. The Executive Director, district co-ordinators and senior managers in attendance will have speaking rights but no voting rights.

6.3.2 Purpose, Powers and Duties of the Coalition Council

- a. The CC will consider and decide on:
- b. The credentials of delegates to the CC
- c. The agenda of the CC
- d. Reports from the Executive Council (EC)
- e. Reports from the Coalition Office Bearers
- f. Reports of the Executive Director, coordinators, sectoral reports and any special reports by the secretariat
- g. Strategic policy matters of the CC
- h. Any other matter deemed to be in the interest of the Coalition including setting dates of the GA.

6.3.3 Meetings of the Coalition Council

Ordinary meetings of the Coalition Council

- a. The CC will meet at least four times a year
- b. The EC will decide on the dates of the CC with at least two months written notice together with an agenda

- c. The documentation will be circulated by the Secretariat at least 14 days prior to the actual meeting

Special meetings of the Coalition Council

- d. The Chairperson will convene a special meeting of the CC giving 7 days written notice and an agenda if:
 - i. The EC passes a resolution calling for such a special meeting
 - ii. Five of the Executive Committees with members in good standing, submit a written request for such a meeting indicating the purpose of such a meeting.
- e. In certain circumstances and subject to certain conditions, both to be determined by the CC, a special meeting may also be called by way of a CC circular, which shall be conducted by means of electronic communications. The CC shall determine the criteria that need to be met in order to satisfy itself to the validity of the decision so reached.

6.3.4 Quorum of the Coalition Council

- a. The quorum of the CC shall be 50% plus one of the total representatives being present as well as the majority of the Office Bearers. A minimum of three representatives of the sector representatives should also be present. Such delegates will be representative of members of civil society organizations in good standing with the coalition and who had their names submitted as delegates to the CC. In the absence of the first delegate, two designated alternates may attend and constitute the quorum.
- b. If after one hour of the time fixed for the meeting a quorum is not present, the meeting will stand adjourned to a time and place decided upon by the Chairperson.
- c. The quorum for an adjourned meeting will be those members present and in good standing and whose names have previously been submitted to the CC as delegates to the CC.

6.3.5 Substitution of Office Bearers

If between meetings of the CA, a vacancy occurs amongst the office bearers of the Coalition, such a vacancy will be filled by the majority resolution of the CC. Such a person will hold office for the balance of the duration of the term of office of all the office bearers.

6.4 Executive Committee (EC)

The Executive Committee shall be the implementing agent of the Coalition Council and the General Assembly.

6.4.1 The Composition of the EC

The EC shall be comprised of all the office bearers together with the Executive Director of the Coalition as an ex-officio member.

6.4.2 Purpose, Powers and Duties of the EC

- a. The EC will manage the affairs of the Coalition between meetings of the CC with such powers as normally vest in an executive body which will include:
- b. Deciding on accepting members as reported by the districts and sectors, and, setting membership fees
- c. Setting employment conditions and confirming the appointments and dismissal of senior executives of the Coalition, including provincial co-ordinators and senior staff of the national office. The Executive Director will appoint all other staff. The EC will also have the right to appoint, suspend or dismiss the Executive Director.
- d. Determining the budgets, approving the expenditure, determining projects and funding of such projects and activities of the Coalition.
- e. Considering and approving district and the Coalition's expenditures.
- f. Considering and approving the annual audited financial statements of the Coalition.
- g. Setting all organizational policies and procedures.
- h. Establishing sub-committees, task groups and determining their terms of references, membership and life.
- i. Passing resolutions for the efficient and effective functioning of the Coalition.

6.4.3 Meetings of the EC

Ordinary Meetings of the EC

- a. The EC will meet at least once a month or more frequently as required through a published calendar of dates.
- b. The Chairperson in consultation with the Executive Director will set the dates of the meetings and agree the draft agenda. The draft agenda will be confirmed or amended or prioritized at the start of the meeting.
- c. The documentation and resolution for such meetings will be circulated by the Secretariat at least five working days prior to the actual meeting date.

Special meetings of the EC

- d. The Chairperson will convene a special meeting of the EC giving 48 hours written notice and an agenda if the majority of members of EC call for such a special meeting
- e. In certain circumstances and subject to certain conditions, both to be determined by the EC, a special meeting may also be called by way of an EC circular, which shall be conducted by

means of electronic communications. The EC shall determine the criteria that need to be met in order to satisfy itself to the validity of the decision so reached.

6.4.4 Quorum of the Executive Committee

The quorum of the EC shall be the full delegation of 50% plus 1 of the sector being present. Such delegates will be representative of members of civil society organisations in good standing with the province and who had their names submitted as delegates to the EC.

- a. If after one hour of the time fixed for the meeting a quorum is not present, the meeting will stand adjourned to a time and place decided upon by the Chairperson, or, should the chair elect to do so call for a circular to be passed envisaged in subparagraph 6.4.3 (e).
- b. The quorum for an adjourned meeting will be those members present and in good standing and whose names have previously been submitted to the EC as delegates or such alternative delegates to the EC.

7. LOSS OF POSITIONS ON COALITION ASSEMBLY, COALITION COUNCIL, EXECUTIVE COMMITTEE.

- 7.1 Any member of any of the structures or sub-committees or task groups of the Coalition will lose his/her position if the member –
 - 7.2 Ceases to be a member of the structure or organisation or district which elected the member.
 - 7.3 Is withdrawn by the constituency which elected the member.
 - 7.4 Ceases to be an elected or full time employee of a civil society organization.
 - 7.5 Is an elected or full time employee of a civil society organization which has lost its membership status.
 - 7.6 Is expelled by the Coalition for just cause.
 - 7.7 Fails to satisfy the requirements of any current legislation which precludes the person from holding office or to perform a fiduciary function through the commission or omission of any act.

8. POWERS AND DECISION MAKING

- 8.1 Any meeting of the Coalition makes a decision if –
 - 8.1.1 The motion is duly seconded; and
 - 8.1.2 A simple majority of members present vote in favour thereof unless otherwise provided for in this Constitution.
 - 8.1.3 The decisions are made either by show of hands or by ballot if the meeting so decides, save as per the circulars provided for.

- 8.1.4 If less than a simple majority vote in favour of a motion, or as otherwise provided for in this Constitution, then the motion lapses.
- 8.1.5 If the EC cannot meet because of circumstances beyond its control, a decision can be made by way of a resolution signed by a simple majority of the members or as otherwise provided for in this Constitution or Regulations.

9. FINANCES, INCOME AND PROPERTY

9.1 General

The funds of the Coalition are made up of all monies received by means of affiliation fees, levies, donations, functions and by any other means within the framework of this Constitution. All sectors and the coalition's head office must provide full disclosure of all funding received and the sources of the funding. The Coalition Counsel will from time to time, establish certain criteria for funding the Coalition.

9.2 Purpose of funds

- 9.2.1 The funds of the coalition must be applied solely in furtherance of the coalition's aims and objectives subject to the decision of the General Assembly, Coalition Counsel and Executive Committee.
- 9.2.2 Funds contributed for a specific purpose must be used for that purpose and no other except as otherwise decided by the Executive Committee, provided that in the event of a contributor external to the coalition it meets such funders approval.
- 9.2.3 No income or property may be distributed to any person, member or office bearer, unless it is as reasonable compensation for services rendered.
- 9.2.4 No Member or office-bearer shall have any rights in the property or other assets of the association solely by virtue of their being members or office-bearers.

9.3 Banking accounts

- 9.3.1 The Executive Director must deposit funds received into the coalition's bank account within 3 days of receipt.
- 9.3.2 No person may open a banking account in the name of the SA NGO Coalition (SANGOCO WP) Western Cape Province, or any other similar name without:
- a. The explicit written authority of a resolution of the Executive Committee, on an official coalition letterhead signed by at least 3 office bearers; and
 - b. Subsequent verbal confirmation to the bank or financial institution concerned by either the Treasurer or Executive Director.

9.4 Members

9.4.1 Members must pay an affiliation fee to the Coalition.

9.4.2 The Executive Committee subject to the directives of the General Assembly will determine the fee from time to time.

9.4.3 Members must pay their fees on an annual basis.

9.4.4 A member that resigns or is expelled shall have no claim on the funds or assets of the Coalition.

9.5 Financial year

The financial year is from April to March of each year.

9.6 Finance Committee

9.6.1 A Financial Committee (Fincom) shall be established, which shall be composed of:

- a. The Treasurer;
- b. Executive Director,
- c. Finance Manager; and
- d. Two other delegates from the Executive Committee nominated by them.

9.6.2 Fincom must meet at least once a month.

9.6.3 The Treasurer is the chairperson of Fincom.

9.6.4 Fincom will report directly to the Executive Committee and must:

- a. Assist the Treasurer;
- b. Prepare financial reports for the EC;
- c. Recommend amendments to financial policy;
- d. Monitor the Coalition's accounts and query unusual expenditure;
- e. Make recommendations to the EC regarding financial requests from provinces;
- f. Propose ways of making the Coalition financially self-sufficient; and
- g. Prepare the Coalition's budget.

9.7 Reporting

- 9.7.1 Fincom must prepare an income and expenditure report for each month to the EC
- 9.7.2 This report must include a clear statement of any unbudgeted expenditure as well as over or under expenditure;
- 9.7.3 The financial report must be accompanied with a narrative statement. A cash flow statement should also be provided for the next reporting period;
- 9.7.4 All provincial offices and the national office must disclose the sources and amounts of funding raised as well as the programmes therefore;
- 9.7.5 The Coalition Counsel must set guidelines for funding priorities and the sources thereof.

9.8 Signatories

- 9.8.1 The EC must appoint the Chairperson, First Deputy Chairperson, Treasurer, Executive Director as signatories to the coalition's Banking Account.
- 9.8.2 Two signatories must authorize any cheque. The Treasurer or alternatively the Chairperson must authorize and sign all cheques over the amount of R20 000.00.

10. INDEMNIFICATION OF OFFICIALS, OFFICE BEARERS AND COMMITTEE MEMBERS

- 10.1 The Officials, Office Bearers and Committee members of the Coalition, provided that they have not acted in a manner which would constitute misconduct, shall :
- 10.2 Be indemnified by the Coalition against all proceedings, costs and expenses incurred by reason of any omission, negligence or other act done whilst performing their duties on behalf of the Coalition or an affiliate; and
- 10.3 Not be personally liable for any of the liabilities of the Coalition or any of its members.

11. RESIGNATION AND DISCIPLINE OF A MEMBER

11.1 Resignation

A member may resign from the Coalition by giving to the Coalition Counsel

- i. 3 months written notice; and
- ii. Its reasons for resigning.
- iii. The CC may waive the notice period.

11.2 Suspension or expulsion

- a. The CC may suspend or expel a member for:
 - i. Acting against the interests of the Coalition;
 - ii. Failing to pay its membership fees.
- b. No such suspension or expulsion shall have effect unless the CC:
 - i. Has notified the member in writing of the reasons for the suspension or expulsion; and
 - ii. Has granted the member permission to present its case to the CC

11.3 Appeals on suspension or expulsion

- a. The member must give notice of their intention to appeal to the Executive Director within 30 days of the decision. The designated representative of the member may be present at any subsequent appeal hearing to present their views.
- b. The appeal must be made in writing to the CC, and the decision of the CC is final and binding.
- c. Where the decision to suspend or expel is made by the CC such decision shall be final and binding, and no appeals will be allowed.

11.4 Financial and legal consequences

- a. Members who resign or are expelled have no claim on the assets of the Coalition.
- b. The EC is empowered to recover all monies owing by the member to the Coalition.

12. DISPUTES BETWEEN AND AMONGST OFFICE BEARERS, OFFICIALS, NATIONAL OR PROVINCIAL STRUCTURES

Disputes between and amongst the office bearers, officials of the Coalition will be dealt with in accordance with policies and procedures established within the Policies and Procedures of the Coalition. Due cognizance will be given to the complex structure of the Coalition and its varied membership.

13. AMENDMENTS TO THE CONSTITUTION

- 13.1. The Constitution may be repealed or amended only by the GA
- 13.2 A notice of the proposed amendment must be sent to the Executive Director.
- 13.3 The Executive Director must:

- a. Circulate the notice to all sectors and members of the GA and
- b. Include the proposed amendment on the next agenda of the GA

13.4 A 2/3 (two-thirds) majority of the GA must agree to the resolution to repeal or amend the Constitution.

14. INTERPRETATION

If there is any doubt as to the interpretation of any provision of this Constitution then:

- a. The EC or the CC may make an interim ruling;
- b. The GA by majority vote, must make the final ruling.

15. DISSOLUTION

15.1 The Coalition may be dissolved by a resolution of the GA supported by more than 75% of the accredited delegates to the GA

- a. The CC must appoint a liquidator to wind up the affairs of the Coalition.
- b. The liquidator must take the necessary steps to liquidate the debts of the Coalition from its available funds and any other monies realized from any assets of the Coalition.

15.2 Upon the dissolution of the Coalition, after all debts and commitments have been paid, any remaining assets shall not be paid to or distributed amongst members, but shall be transferred by donation to some other non-profit organisation by the liquidator, identified by the CC (and failing which any division of the High Court) considers appropriate and which has objectives the same or similar to the objectives of the Coalition, and should the Coalition be exempt from the payment of any taxes and duties;

- a. Any similar public benefit organization which has been approved in terms of section 30 of the Income Tax Act,
- b. Any institution, board or body which is exempt from tax under the provisions of the Income Tax Act, which has its sole or principal object the carrying on of any public benefit activity,
- c. Any department of state or administration in the national or provincial or local sphere of government of the Republic.